

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

PARTNERS IN NUTRITION d/b/a)
PARTNERS IN QUALITY CARE,)
Plaintiff,)
v.)
MINNESOTA DEPARTMENT OF)
EDUCATION; MONICA)
HERRERA, in her individual)
capacity and official capacity as)
Director of Nutrition Program)
Services; EMILY HONER, in her)
individual capacity and official)
capacity as Program Integrity Work)
Manager and JEANETTE)
JOHNSON-REED, in her individual)
capacity and official capacity as)
Supervisor of Compliance,)
Defendants.)

Case No. 22-cv-02195-JRT-JFD

**SECOND DECLARATION OF
ROBYN TOUSIGNANT IN
SUPPORT OF MOTION FOR
TEMPROARY
RESTRAINING ORDER**

I, Robyn Tousignant, state as follows:

1. I am a resident of Brooklyn Park, Minnesota, and over 18 years of age.
2. This declaration is made based on my own personal knowledge and belief and I understand that it is being submitted to the Court in support of Plaintiffs' Memorandum in Support of its Motion for a Temporary Restraining Order against Defendants. If called to testify in Court to the facts stated in this declaration, I am willing to do so.
3. I previously submitted a Declaration dated September 21, 2022, in this matter. I am supplementing that testimony with certain additional facts in response to the opposition papers submitted by the attorneys for MDE on September 28, 2022.

4. None of the sites represented by the emails that were attached as **Exhibit 1** to my September 21 Declaration (informing PIQC that they were ending their contracts or relationships with PIQC) were indicted or identified by name in the federal indictments announced last week. Once we have a protective order in place and permission to do so, PIQC will unredact and disclose the names contained in **Exhibit 1** to the Court.

5. None of the sites represented in the MDE sponsor transfer forms that were attached as **Exhibit 2** to my September 21, 2022, Declaration were indicted or identified by name in the federal indictments announced last week. Once we have a protective order in place and permission to do so, PIQC will unredact and disclose the names contained in **Exhibit 2** to the Court.

6. Attached to this second declaration as **Exhibit 4** is a copy of an unsolicited email on September 10, 2022, from someone named Tom Barrett, whom I do not know.

7. Attached to this second declaration as **Exhibit 5** is a copy of an email exchange in August and September 2022, between Mount Olivet Lutheran Church and me. Attached to the September 28, 2022, email from Mount Olivet to me is a Sponsor Transfer Request, which speaks for itself. The personal identifying information for Mount Olivet individual representatives has been redacted for this exhibit until a protective order is entered.

8. Mount Olivet is one of the sites for which PIQC was previously a sponsor in the CACFP. Mount Olivet has not, to my knowledge, been indicted or identified by name in the recent federal indictments.

I declare under penalty of perjury that everything I have stated in this document is true and correct.

/s/ Robyn Tousignant
Robyn Tousignant

Dated: September 29, 2022.